

**Exhibit C**  
**Certificate of Title**

STATE OF CALIFORNIA		CERTIFICATE OF TITLE		VEHICLE HISTORY	
VIN: 1G1ZC1371201665		YEAR: 2003		MAKE: GMC	
PLATE: 4NCV674		REGISTRATION DATE: 05/06/2003		REGISTRATION EXPIRATION DATE: 05/23/08	
CLASS: 2003		TYPE: 2002		PV	
EQUIPMENT/TRAILER NUMBER:		ODOMETER DATE: 02/06/2002		ODOMETER READING: 14355 MI	
ACTUAL MILEAGE:		REGISTERED OWNER:		MONTY LARONDA	
15004 EASTWOOD AVE		LAKINDALE CA 90260			
I certify for and am under penalty of perjury under the laws of the State of California that THE SIGNATURE(S) BELOW RELEASES INTEREST IN THE VEHICLE.					
DATE: 12/17/10		SIGNATURE OF REGISTERED OWNER: [Signature]			
DATE: 12/17/10		SIGNATURE OF REGISTERED OWNER: [Signature]			
Federal and State law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.					
The odometer now reads 14355 miles and to the best of my knowledge reflects the actual mileage unless one of the following statements is checked:					
<input checked="" type="checkbox"/> The odometer is correct to the nearest mile.					
<input type="checkbox"/> The odometer is not correct to the nearest mile.					
I hereby declare under penalty of perjury under the laws of the State of California that the foregoing statement is correct.					
<input checked="" type="checkbox"/> I am the owner of this vehicle.					
<input type="checkbox"/> I am not the owner of this vehicle.					
I hereby agree to sell this vehicle for a cash sale.					
I hereby agree to sell this vehicle for a loan sale.					
<b>IMPORTANT: READ CAREFULLY</b>					
See change of ownership notice on back of this certificate. It must be reported to the Department of Motor Vehicles within 10 days.					
SIGNATURE: [Signature]					
DATE: 12/17/10					
CA 113056627					
001276					
KEEP IN A SAFE PLACE. VOID IF ALTERED.					

**Exhibit D**  
**Supplemental Response to First Set of Special Interrogatories**

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Attorneys for Plaintiffs and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST

La RONDA HUNTER, ROSANA N.  
 PULGARIN and ROBIN GONZALES on  
 behalf of themselves and on behalf of all  
 others similarly situated and the general  
 public,

Plaintiffs,

v.

GENERAL MOTORS CORPORATION and  
 DOES 1 through 100,

Defendants.

CASE No. BC 324622

[Assigned to Hon. Anthony J. Mohr, Dept. 309]

**LA RONDA HUNTER'S SUPPLEMENTAL  
 RESPONSE TO DEFENDANT'S FIRST SET OF  
 INTERROGATORIES**

[SET ONE]

Complaint Filed: November 16, 2004  
 Trial Date: Not Set Yet

PROPOUNDING PARTY: GENERAL MOTORS CORPORATION

RESPONDING PARTY: LA RONDA HUNTER

SET NO: ONE (1)

**PRELIMINARY STATEMENT**

Plaintiff has not completed her investigation of the facts relating to this case or discovery in this action and has not completed preparation for trial on the merits of Plaintiff's claims. Plaintiff's responses are limited to such information that is presently and specifically known to Plaintiff. If additional information is subsequently discovered which would require a change in response, the responses will be amended as may be appropriate. It is also anticipated that further discovery, independent investigation, legal research and analysis may supply additional facts, add meaning to known facts as well as establish entirely new factual matters, conclusions and legal contentions. The following responses are given without prejudice to Plaintiff's right to produce evidence of subsequently discovered information.

**GENERAL OBJECTIONS AND QUALIFICATIONS**

Plaintiff objects to Defendant's First Set of Interrogatories and qualifies her responses thereto on each of the following grounds:

1. Plaintiff objects to these Interrogatories to the extent they attempt to impose obligations on Plaintiff other than those imposed or authorized by the California Code of Civil Procedure and/or any applicable order of this Court.

2. Plaintiff objects to these Interrogatories on the grounds that they are premature in that discovery is ongoing and incomplete and that Defendant has not produced documents or information in response to Plaintiff's discovery and that Plaintiff has not yet taken the depositions of Defendants employees and/or person(s) most qualified to testify concerning matters related to the merits of Plaintiff's claims.

3. Plaintiff further objects to these Interrogatories to the extent they seek information equally available to Defendant and/or the information sought is more readily available to Defendant than to Plaintiff.

4. Plaintiff objects to each interrogatory to the extent it seeks private information protected by rights of privacy under California or federal law.

5. Plaintiff objects to each interrogatory to the extent it seeks information that is not within

1 Plaintiff's possession, custody, control or knowledge.

2 6. Plaintiff's objections and responses are made without waiving the right to object to the  
3 use of any response on the grounds of relevance, materiality, hearsay or any other appropriate ground.

4 7. Plaintiff reserves the right to revise, correct, clarify or supplement any of these responses  
5 at any time. Plaintiff and her counsel have not completed their investigation, analysis or discovery  
6 related to this case. The responses contained herein are based on Plaintiff's knowledge and the  
7 information and documents in her possession, custody and control. Plaintiff anticipates that further  
8 discovery, investigation, legal research and analysis could supply additional responsive information.

9 8. These General Objections are incorporated into each of the following Interrogatories, and  
10 the General Objections shall be deemed continuing as to each Interrogatory and are not waived, or in  
11 any way limited, by the following objections and responses.

12 Subject to the aforementioned objections, Plaintiff responds as follows:

13  
14 **SPECIFIC OBJECTIONS AND SUPPLEMENTAL RESPONSES TO INTERROGATORIES:**

15  
16 **INTERROGATORY NO. 1:** State whether you own or lease one or more Subject Vehicles. If you do  
17 own or lease one or more Subject Vehicles, state, with respect to each Subject Vehicle owned or leased,  
18 the circumstances under which you acquired the vehicle, including, but not limited to:

19 a. the model and model year of the vehicle, the Vehicle Identification Number ("VIN") of the  
20 vehicle, the current odometer reading on the vehicle and the name of the present registered owner and  
21 principal driver(s);

22 b. whether you acquired the vehicle by purchase, lease, gift, trade, or otherwise, whether the  
23 vehicle was purchased, leased, or otherwise acquired new or used, the date that you acquired the vehicle,  
24 the person in whose name the vehicle was purchased, leased, or otherwise acquired, and the odometer  
25 reading on the vehicle on the date that you acquired it;

26 c. the name and address of the individual or entity from whom you acquired the vehicle;

27 d. the price that you paid to acquire the vehicle, the financing terms, if any, of your purchase or  
28 lease, whether you traded in another vehicle with the seller at the time of your acquisition of the Subject

1 Vehicle, and if so, identify that vehicle by make, model and year, and the amount you were credited in  
2 trade for the vehicle.

3  
4 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

5 Objection. Plaintiff objects that this interrogatory is improperly compound, conjunctive and  
6 disjunctive and contains subparts in violation of CCP § 2030.060(f), which forbids special  
7 interrogatories from containing subparts and compound, conjunctive or disjunctive questions. For these  
8 reasons the interrogatory also is unlawful, overbroad, unduly burdensome and intentionally harassing.  
9 Plaintiff objects to Defendant's purported "Definitions and Instructions" section on the ground that it is  
10 prohibited by CCP § 2030.060(d), which states that "[e]ach interrogatory shall be full and complete in  
11 and of itself. No preface or instruction shall be included with a set of interrogatories unless it has been  
12 approved under Chapter 17 (commencing with Section 2033.710)." Plaintiff regards Defendant's  
13 "Definitions and Instructions" as null and void and her responses, if any, will be based on a reasonable  
14 construction of the terms used and the questions posed based on common usage in the English language.  
15 Further objection is made that Defendant's effort to impose a continuing duty to supplement, contained  
16 in the "Definitions and Instructions" section, violates CCP § 2030.060(g), which states that "[a]n  
17 interrogatory may not be made a continuing one so as to impose on the party responding to it a duty to  
18 supplement an answer to it that was initially correct and complete with later acquired information."  
19 Plaintiff further objects that the term "Subject Vehicle" is vague and ambiguous and not defined in this  
20 interrogatory, rendering this interrogatory in violation of CCP § 2030.060(d) and (e), the latter of which  
21 states that "[a]ny term specially defined in a set of interrogatories shall be typed with all letters  
22 capitalized wherever that term appears." Objection is also made that certain of the information  
23 requested is not relevant to the subject matter or reasonably calculated to lead to the discovery of  
24 admissible evidence, and the interrogatory is thus overbroad. Plaintiff also objects to the extent that  
25 certain of the information requested is protected by rights of privacy under California or federal law.  
26 Objection is further made on the ground that certain of the information requested is equally available to  
27 Defendant or already in Defendant's possession.

28 Subject to and without in any way waiving the foregoing objections, Plaintiff responds as

1 follows: Assuming that the term "Subject Vehicle" has the same meaning that term has in Plaintiff's  
2 operative Complaint, Plaintiff does own a "Subject Vehicle." Specifically, Plaintiff owns a 2001 GMC  
3 Yukon with Vehicle Identification Number 1GKEC13T71J201855. The current odometer reading is  
4 90,499. The registered owner is La Ronda Hunter. The principal driver is La Ronda Hunter.

5 Supplementing her response subject to the aforementioned objections, Plaintiff states: The  
6 Yukon was purchased "new" as a demonstration vehicle, with approximately 1,800 miles on the  
7 odometer. There was no trade-in. The purchase price, as stated elsewhere in Plaintiff's discovery  
8 responses, was approximately \$33,000. Plaintiff believes she purchased it at Justice Auto in Carson,  
9 CA.

10  
11 **INTERROGATORY NO. 3:** For each Subject Vehicle identified in response to Interrogatories No. 2  
12 and No. 3 above, state the nature of any and all work performed on the vehicle(s) including, but not  
13 limited to, modifications, additions, repairs and maintenance, and identify any and all documents  
14 relating to said work performed.

15  
16 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:**

17 Objection. Plaintiff objects that this interrogatory is improperly compound, conjunctive and  
18 disjunctive, and contains subparts in violation of CCP § 2030.060(f), which forbids special  
19 interrogatories from containing subparts and compound, conjunctive or disjunctive questions. For these  
20 reasons the interrogatory also is unlawful, overbroad, unduly burdensome and intentionally harassing.  
21 Plaintiff objects to Defendant's purported "Definitions and Instructions" section on the ground that it is  
22 prohibited by CCP § 2030.060(d), which states that "[e]ach interrogatory shall be full and complete in  
23 and of itself. No preface or instruction shall be included with a set of interrogatories unless it has been  
24 approved under Chapter 17 (commencing with Section 2033.710)." Plaintiff regards Defendant's  
25 "Definitions and Instructions" as null and void and her responses, if any, will be based on a reasonable  
26 construction of the terms used and the questions posed based on common usage in the English language.  
27 Further objection is made that Defendant's effort to impose a continuing duty to supplement, contained  
28 in the "Definitions and Instructions" section, violates CCP § 2030.060(g), which states that "[a]n



1 interrogatory may not be made a continuing one so as to impose on the party responding to it a duty to  
2 supplement an answer to it that was initially correct and complete with later acquired information."  
3 Plaintiff further objects that the term "Subject Vehicle" is vague and ambiguous and not defined in this  
4 interrogatory, rendering this interrogatory in violation of CCP § 2030.060(d) and (e), the latter of which  
5 states that "[a]ny term specially defined in a set of interrogatories shall be typed with all letters  
6 capitalized wherever that term appears." Objection is also made that certain of the information  
7 requested is not relevant to the subject matter or reasonably calculated to lead to the discovery of  
8 admissible evidence, since it unreasonably asks for information regarding all work performed on a  
9 vehicle(s) over a period of many years without any connection to the issues in this case and could thus  
10 encompass work, repairs and "maintenance" such as routine oil changes, tune-ups, car washes, headlamp  
11 exchanges, etc. The interrogatory is thus overbroad, unduly burdensome and harassing.

12 Subject to and without in any way waiving the foregoing objections, Plaintiff states as follows:  
13 Her defective parking brake system was replaced in April 2005. See also Plaintiff's Response to  
14 Interrogatory No. 14 below, as well as her response to Form Interrogatory No. 7.3.

15 Further responding pursuant to the parties' "meet and confer" agreements and limitations  
16 regarding the scope of this interrogatory, Plaintiff states that before the defective parking brake system  
17 was replaced in April 2005, Plaintiff took the Yukon to a GM dealer (Power Chevrolet) located at 14800  
18 Hindry, in Hawthorne, CA in October 2004 because her ABS light was staying on. The problem was  
19 corrected at no charge to Plaintiff. As reflected in the repair records previously produced by Plaintiff  
20 with bates-numbers P3021-3022, it appears the dealer made repairs to a shorted module to correct the  
21 problem. Plaintiff does not recall having any repairs to, or noticeable problems with, her vehicle's  
22 transmission.

23 DATED: November 14, 2008

SPIRO MOSS BARNES LLP

24  
25  
26 By:

  
J. Mark Moore  
Attorneys for Plaintiffs La RHONDA HUNTER,  
ROSANA N. PULGARIN, ROBIN GONZALES  
and all others Similarly Situated

**VERIFICATION**

I am a party to this action. I either have personal knowledge that the answers in the attached Plaintiff La Ronda Hunter's Supplemental Response to Defendant's First Set of Interrogatories are true, or, to the extent I lack such personal knowledge with respect to certain answers, I believe that those answers are true.

Dated: 11-14-2008

La Ronda Hunter

**PROOF OF SERVICE**  
**HUNTER v. GENERAL MOTORS CORPORATION**  
**CASE NO. BC 324622**

I am over the age of eighteen years and not a party to the within action. My business address is 11377 W. Olympic Blvd., 5<sup>th</sup> Floor, Los Angeles, CA 90064-1683. I am employed at that address at the firm of Spiro Moss Barness LLP.

On the date set forth below I served the document(s) described as **PLAINTIFF LA RONDA HUNTER'S SUPPLEMENTAL RESPONSE TO DEFENDANT'S FIRST SET OF INTERROGATORIES** on all the interested parties in this action, by placing: ☐ the original ☒ true copies thereof enclosed in sealed envelopes, addressed as follows, which addresses are the addresses last given by the respective addressees on any document filed in the above case and served on Spiro Moss Barness LLP:

J. Andrew Langan  
Brian P. Kavanaugh  
KIRKLAND & ELLIS LLP  
200 East Randolph Drive  
Chicago, IL 60601  
Phone: 312.861.2000  
Fax: 312.861.2200  
[alangan@kirkland.com](mailto:alangan@kirkland.com)  
[bkavanaugh@kirkland.com](mailto:bkavanaugh@kirkland.com)

Pantea Yashar  
KIRKLAND & ELLIS LLP  
777 S. Figueroa St., #3700  
Los Angeles, CA 90017  
Phone: 213.680.8400  
Fax: 213.680.8500  
[pyashar@kirkland.com](mailto:pyashar@kirkland.com)

☐ **BY MAIL (Pickup):** I am readily familiar with this firm's practice of collection and processing correspondence for mailing with the United States Postal Service. On the date set forth below, at the firm of Spiro Moss Barness LLP at the above address, I placed the envelope(s) containing said document(s), sealed, for collection and mailing on that date with the United States Postal Service following ordinary business practices. Under the above-mentioned practice of Spiro Moss Barness LLP, the above document(s) would be deposited with the United States Postal Service on that same day in the ordinary course of business, with postage thereon fully prepaid at Los Angeles, California.

☐ **BY MAIL (Drop Off):** On the date set forth below I deposited such envelope(s), in a mailbox regularly maintained by the U.S. Postal Service in Los Angeles County, California. The envelope(s) was/were deposited with postage thereon fully prepaid.

☐ **BY EXPRESS MAIL:** On the date set forth below I deposited such envelope(s) in an Express Mail mailbox, maintained by the U.S. Postal Service for receipt of Express Mail in Los Angeles County, California. The envelope(s) was/were deposited with Express Mail with postage thereon fully prepaid.

☐ **BY METHOD OF DELIVERY PROVIDING FOR OVERNIGHT DELIVERY:** On the date set forth below I deposited such envelope(s) in a box or other facility regularly maintained by the express service carrier, or delivered such envelope(s) to an authorized courier or driver authorized by the express service carrier to receive documents, with delivery fees paid or provided for. The envelope was an envelope or package designated by the express service carrier.

☐ **BY PERSONAL SERVICE:** I personally caused said document(s) on the date set forth below, inside the envelope(s) clearly labeled to identify the attorney(s) to be served, at the offices of the attorney(s) listed above, at the address(es) listed above, with a receptionist or other person having charge of the office(s), between the hours of 9:00 a.m. and 5:00 p.m.

1 ☐ **BY FACSIMILE** On the date set forth below, I transmitted the above document(s) from  
2 facsimile machine number (310) 235-2456, in compliance with transmission as provided in  
3 California Rule of Court 2008. The fax number(s) that I used are shown above or on the  
4 attached Service List, along with the names of recipients and the interested parties. The  
Facsimile Machine I used complied with California Rule of Court 2003(3). The transmission  
was reported as complete and without error by the machine, which properly issued the  
transmission report.

5 ☒ **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be  
6 transmitted the document(s) listed above to the above email address(s) before 6:00 p.m.

7 ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the  
8 above is true and correct.

9 ☐ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court  
10 at whose direction the service was made.

11 Executed at Los Angeles County, California, on November 14, 2008.

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14 Cole Oliver  
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